

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN COLLIER, KRYSTA RENFRO, ALEX  
SAMUELS, BRADLEY CARICOFÉ, SHAWN  
THIBODEAUX, JULIE THIBODEAUX,  
CATHY CARROLL, LAZARO GOMEZ,  
KENNETH HUNNEL, LEANNE HUNNEL,  
and JAMES KOHEN, individually, and on  
behalf of a class of similarly situated  
individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:23-cv-05778-BHS

**STIPULATED MOTION AND ORDER  
REGARDING RESPONSIVE PLEADING  
AND RULE 26 DEADLINES**

**NOTE ON MOTION CALENDAR:  
DECEMBER 1, 2023**

Plaintiffs John Collier, Krysta Renfro, Alexa Samuels, Bradley Caricofe, Shawn Thibodeaux, Julie Thibodeaux, Cathy Carroll, Lazaro Gomez, Kenneth Hunnel, Leanne Hunnel, and James Kohen (“Plaintiffs”) and Defendant Ford Motor Company (“Ford” or “Defendant”) (collectively, the “Parties”) stipulate and move the Court with reference to the following facts and recitals:

On October 23, 2023, Plaintiffs filed a First Amended Complaint in this action (Dkt. 23).

Pursuant to the Parties’ stipulation, Defendant’s deadline to file a response to Plaintiffs’ amended complaint is on December 8, 2023 (Dkt. 22).

The Parties have engaged in extensive meet and confers concerning potential challenges to the complaint and potential jurisdictional challenges. Parties believe it would be productive and

1 promote efficiency for these discussions to continue and, accordingly, respectfully request that the  
2 Court continue by 60 days (1) Defendant's response to the amended complaint and related briefing  
3 schedule and, (2) the Rule 26 deadlines, to allow time for further conferral on potential motion  
4 challenges.

5 THEREFORE, THE PARTIES HEREBY STIPULATE, SUBJECT TO THIS COURT'S  
6 APPROVAL, TO THE ENTRY OF AN ORDER AS FOLLOWS:

7 1. Ford's deadline to file a response to Plaintiffs' Amended Complaint is extended from  
8 December 8, 2023 to February 6, 2024.

9 2. Plaintiffs' response to Rule 12 motion, if filed is March 12, 2024

10 3. Defendant's reply in support of Rule 12 motion, if filed: March 28, 2024

11 4. Noting date for Defendants Rule 12 motion, if filed: March 28, 2024

12 5. The Rule 26 are: Deadlines is 2/20/2024, Initial Disclosure Deadline is 2/28/2024, Joint  
13 Status Report due by 3/4/2024

14 IT IS SO STIPULATED.

15 Dated: November 30, 2023

16 /s/ Jason T. Dennett  
17 On Behalf of Plaintiffs

18 Jason T. Dennett, WSBA #30686  
19 [jdennett@tousley.com](mailto:jdennett@tousley.com)  
20 s/Cecily C. Jordan  
21 Cecily C. Jordan, WSBA #50061  
22 [cjordan@tousley.com](mailto:cjordan@tousley.com)  
23 s/Kaleigh N. Boyd  
24 Kaleigh N. Boyd, WSBA #52684  
[kboyd@tousley.com](mailto:kboyd@tousley.com)  
TOUSLEY BRAIN STEPHENS PLLC  
1200 5th Avenue, Suite 1700  
Seattle, WA 98101  
206.682.5600 206.682.2992

25 By: s/Russell D. Paul  
26 Russell D. Paul \*  
27 Abigail J. Gertner \*\*  
28 Amey J. Park \*\*  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103

STIPULATION AND ORDER  
CASE NO.: 3:23-cv-05778-BHS

/s/ Amir Nassihi  
On Behalf of Defendant  
Nissan North America, Inc.

Steven Rich, WSBA #48444  
Shook, Hardy & Bacon L.L.P.  
Columbia Center  
701 Fifth Ave., Suite 6800  
Seattle, Washington 98104  
Telephone: 206.344.7600  
Facsimile: 206.344.3113  
[srich@shb.com](mailto:srich@shb.com)

Amir Nassihi, appearance *pro hac vice*  
SHOOK, HARDY & BACON L.L.P.  
555 Mission Street, Suite 2300  
San Francisco, CA 94105  
Tel: 415.544.1900 | Fax: 415.391.0281  
[anassihi@shb.com](mailto:anassihi@shb.com)

SHOOK, HARDY & BACON L.L.P.  
555 Mission Street, Suite 2300  
San Francisco, CA 94105, Tel: 415.544.1900

215.875.3000

[rpaul@bm.net](mailto:rpaul@bm.net)

[agertner@bm.net](mailto:agertner@bm.net)

[apark@bm.net](mailto:apark@bm.net)

By: s/Ketan A. Patel

Ketan A. Patel \*

CORPUS LAW PATEL, LLC

P.O. Box 724713

Atlanta, Georgia 31139

678.597.8020

[kp@corpus-law.com](mailto:kp@corpus-law.com)

By: s/Tarek H. Zohdy

Tarek H. Zohdy \*

s/Cody R. Padgett

Cody R. Padgett \*

s/Laura E. Goolsby

Laura E. Goolsby \*

CAPSTONE LAW, APC

1875 Century Park East Suite 1000

Los Angeles, CA 90067

Telephone: (310) 556-4811

[Tarek.Zohdy@Capstonelawyers.com](mailto:Tarek.Zohdy@Capstonelawyers.com)

[Cody.Padgett@Capstonelawyers.com](mailto:Cody.Padgett@Capstonelawyers.com)

[Laura.Goolsby@Capstonelawyers.com](mailto:Laura.Goolsby@Capstonelawyers.com)

Jonathan D. Selbin \*\*

Jason L. Lichtman \*

Muriel Kenfield-Kelleher \*

LIEFF CABRASER HEIMANN &

BERNSTEIN, LLP

250 Hudson Street, 8th Floor

New York, NY 10013-1413

212.355.9500

[jselbin@lchb.com](mailto:jselbin@lchb.com)

[jlichtman@lchb.com](mailto:jlichtman@lchb.com)

[mkenfieldkelleher@lchb.com](mailto:mkenfieldkelleher@lchb.com)

Andrew R. Kaufman \*

LIEFF CABRASER HEIMANN &

BERNSTEIN, LLP

222 2nd Avenue South, Suite 1640

Nashville, Tennessee 37201

615.313.9000

[akaufman@lchb.com](mailto:akaufman@lchb.com)

E. Powell Miller\*

Dennis A. Lienhardt\*

THE MILLER LAW FIRM PC

950 W. University Dr., Ste. 300

Rochester, MI 48307

STIPULATION AND ORDER

CASE NO.: 3:23-cv-05778-BHS

SHOOK, HARDY & BACON L.L.P.

555 Mission Street, Suite 2300

San Francisco, CA 94105, Tel: 415.544.1900

1 Telephone: (248) 841-2200

2 Facsimile: (248) 652-2852

3 [epm@millerlawpc.com](mailto:epm@millerlawpc.com)

4 [ssa@millerlawpc.com](mailto:ssa@millerlawpc.com)

5 Stephen R. Basser\*\*

6 Samuel M. Ward\*\*

7 BARRACK, RODOS, & BACINE

8 600 W Broadway, Suite 900

9 San Diego, CA 92101

10 Telephone: (619)230-0800

11 Facsimile: (619) 230-1874

12 [sbasser@barrack.com](mailto:sbasser@barrack.com)

13 [sward@barrack.com](mailto:sward@barrack.com)

14 John G. Emerson\*\*

15 EMERSON FIRM, PLLC

16 2500 Wilcrest, Suite 300

17 Houston, TX 77042

18 [jemerson@emersonfirm.com](mailto:jemerson@emersonfirm.com)

19 Telephone: (800) 551-8649

20 \*admitted *pro hac vice*

21 \*\**pro hac vice* pending

22 Attorneys for Plaintiffs and the Proposed Classes

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 4th, 2023.



---

BENJAMIN H. SETTLE  
United States District Judge